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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

Competitive Product Prices Global Reseller Expedited Package Contracts 2 (MC2013-51 and CP2013-64) Negotiated Service Agreement Docket No. CP2020-234

PUBLIC REPRESENTATIVE COMMENTS ON POSTAL SERVICE NOTICE OF MODIFICATION ONE TO GLOBAL RESELLER EXPEDITED PACKAGE 2 NEGOTIATED SERVICE AGREEMENT

(August 20, 2021)

The Public Representative hereby provides comments pursuant to the Commission notice initiating this docket.¹ In that notice, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Modification One to a Global Reseller Expedited Package 2 Negotiated Service Agreement (Contract).²

The Commission approved the original Contract in Order No. 5624.³ The Postal Service filed a public (redacted) version of Modification One and a public (redacted) version of the certifying statement. The Postal Service filed the unredacted versions under seal along with supporting financial data. Modification One is scheduled to become effective September 1, 2021. Notice at 1.

¹ Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, August 13, 2021.

² Notice of the United States Postal Service of Filing Modification One to Global Reseller Expedited Package 2 Negotiated Service Agreement, August 12, 2021. (Notice)

³ Order Approving Additional Global Reseller Expedited Package Services 2 Negotiated Service Agreement, August 11, 2020.

COMMENTS

The Public Representative has reviewed Modification One, the financial data, as well as the original Contract. Based upon that review, the Public Representative concludes that the Contract will continue to generate sufficient revenue to cover costs and thereby satisfies the requirements of 39 U.S.C. § 3633(a).

Sufficient Revenue Requirement. Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service. Based upon a review of the financial data, it appears that the Contract will continue to generate sufficient revenue to cover costs over the duration of the Contract.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Gregory Stanton
Public Representative

901 New York Ave. NW Washington, DC 20268-0001 202-789-6864 gregory.stanton@prc.gov